

Mr. Fred Emmert
GBMD, Inc.
1520 Mishawaka Street
Elkhart, IN 46516

Re: **039-12793-00312**
First Administrative Amendment to Incorporate
Significant Source Modification to:
Part 70 039-6921-00312

Dear Mr. Emmert:

GBMD, Inc. was issued a Part 70 operating permit (T039-6921-00312) on December 31, 1998 for the operation of a truck and van conversion source. The Significant Source Modification (039-12046-00312) will be incorporated into the Part 70 operating permit with an Administrative Amendment. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary van and truck conversion source.

Responsible Official:	Norb Hess Fred Emmert
Source Address:	1520 Mishawaka Street, Elkhart, Indiana 46515
Mailing Address:	1520 Mishawaka Street, Elkhart, Indiana 46515
SIC Code:	3716
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

a. One (1) surface coating paint booth, ~~known~~ **identified** as EU2, ~~equipped with air atomization spray applicators,~~ **with a maximum capacity of three (3) vans or trucks per hour, using dry filters as particulate matter (PM) overspray control,** ~~equipped with dry filter for overspray control,~~ **and** exhausting through stacks E1, E2 and E3; ~~capacity: 3 vans or trucks per hour.~~

b. Two (2) assembly areas, ~~known~~ **identified** as EU4, **with a total maximum capacity of three (3) vans or trucks per hour;**

~~c. Two (2) woodworking areas, known as EU3, equipped with two (2) cyclone dust collectors, exhausting through stack D1 and D2.~~

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

Two (2) woodworking areas, identified as EU3, each with one (1) baghouse for particulate matter control.

~~This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).~~

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) surface coating paint booth, identified as EU2, with a maximum capacity of three (3) vans or trucks per hour, using dry filters for overspray control and exhausting at three (3) stacks, identified as E1, E2 and E3; and**
- (b) Two (2) assembly areas, identified as EU4, with a maximum capacity of three (3) vans or trucks per hour.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (General provisions relating to VOC rules: general reduction requirements for new facilities):

- (a) The total volatile organic compound (VOC) input from the application of paints, sealants, and adhesives, including any cleanup solvents, shall be limited to less than 150 tons per twelve consecutive month period.**
- (b) The VOC content of the sealers applied shall not exceed 8.8 pounds per gallon less water, based on 30-day weighted average;**
- (c) The VOC content of the paints applied shall not exceed 6.1 pounds per gallon less water, based on 30-day weighted average;**
- (d) The VOC content of the solvents applied shall not exceed 6.8 pounds per gallon less water, based on 30-day weighted average;**
- (e) The following pollution prevention techniques shall be adhered to:**
 - (1) All paints applied in the paint booth (EU2) shall be applied using high volume, low pressure (HVLP) or air assisted airless spray guns, or equivalent spray applicators at least as efficient, with dry filters for overspray control;**
 - (2) The spray guns used in the paint booth (EU2) shall be the type that can be cleaned without the need for spraying the solvent into the air;**

- (3) The cleanup solvent containers used to transport solvent from drums to work areas will be closed containers having soft gasketed spring-loaded closures;
- (4) Clean-up rags saturated with solvent will be stored, transported, and disposed of in containers that are tightly closed;
- (5) All solvent sprayed during cleanup or color changes in EU2 shall be directed into containers. Such containers will be closed as soon as solvent spraying is complete and the waste solvent will be disposed of in such a manner that evaporation is minimized;
- (6) Storage containers used to store VOC and/or HAPs containing materials will be kept covered when not in use;
- (7) The EU2 paint application equipment operators will be instructed and trained on the methods and practices to minimize overspray and maximize transfer efficiency;
- (8) Coatings will be used that contain the lowest levels of VOC possible. The use of exempt solvents such as water, acetone and methyl acetate will be used to the extent possible.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.3 Vehicle Limitation [326 IAC 8-2-9]

The number of vehicles coated shall be limited to thirty-four (34) vehicles per day and any change or modification which increases the number of vehicles coated per day to thirty-five (35) or greater shall require IDEM, OAMs prior approval before any such change may occur. Therefore, 326 IAC 8-2-9 does not apply.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to CP-039-4365-00312, issued on May 31, 1995, and pursuant to 326 IAC 6-3-2, the PM from the one (1) paint booth (EU2), and the two (2) assembly areas (EU4), shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period).

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2, the dry filters for PM control shall be in operation at all times when the one (1) paint booth (EU2) is in operation.

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters when EU2 is in operation. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (E1, E2, and E3) for any week during which EU2 is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed, for any month during which EU2 is in operation, of the coating emissions from the stacks and the general ventilation exhausts, and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1(a) through (d), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The 30-day weighted average VOC content for each type of coating;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.

- (b) To document compliance with Condition D.1.9 and D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.1.3, the Permittee shall maintain a record of the number of vehicles coated per day.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1(a) and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Two (2) woodworking areas, identified as EU3, each with one (1) baghouse for particulate matter control.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 2.11 pounds per hour when operating at a process weight rate of 740 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where

E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: GBMD, Inc.
Source Address: 1520 Mishawaka Street, Elkhart, Indiana 46515
Mailing Address: 1520 Mishawaka Street, Elkhart, Indiana 46515
Part 70 Permit No.: T039-6921-00312

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually based on a calendar year. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: GBMD, Inc.
Source Address: 1520 Mishawaka Street, Elkhart, Indiana 46515
Mailing Address: 1520 Mishawaka Street, Elkhart, Indiana 46515
Part 70 Permit No.: T039-6921-00312
Facility: One (1) surface coating paint booth (EU2), and two (2) assembly areas (EU4)
Parameter: Volatile organic compounds (VOC)
Limit: (a) The total volatile organic compound (VOC) input from the application of paints, sealants, and adhesives, including any cleanup solvents, shall be limited to less than 150 tons per twelve (12) consecutive month period.
(b) The VOC content of the sealers applied shall not exceed 8.8 pounds per gallon less water, based on 30-day weighted average;
(c) The VOC content of the paints applied shall not exceed 6.1 pounds per gallon less water, based on 30-day weighted average; and
(d) The VOC content of the solvents applied shall not exceed 6.8 pounds per gallon less water, based on 30-day weighted average.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC This Month (tons)	VOC Previous 11 Months (tons)	12 Month Total VOC (tons)
Month 1			
Month 2			
Month 3			

30-day Weighted Average VOC Content (in pounds per gallon less water):

Sealers: _____ **Paints:** _____ **Solvents:** _____

- 9 No deviation occurred in this quarter.
9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: GBMD, Inc.
Source Address: 1520 Mishawaka Street, Elkhart, Indiana 46515
Mailing Address: 1520 Mishawaka Street, Elkhart, Indiana 46515
Part 70 Permit No.: T 039-6921-00312
Facilities: One (1) surface coating paint booth (EU2) and two (2) assembly areas (EU4)
Parameter: Number of vehicles coated
Limit: Thirty-four (34) vehicles per day, each, for EU2 and EU4

Month: _____

Year: _____

Day	# of Vehicles Coated		Day	# of Vehicles Coated	
	EU2	EU4		EU2	EU4
1			17		
2			18		
3			19		
4			20		
5			21		
6			22		
7			23		
8			24		
9			25		
10			26		
11			27		
12			28		
13			29		
14			30		
15			31		
16			no. of deviations		

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is not required for this report.

The permit cover page and table of contents will also be updated to include the above referenced information. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Linda Quigley, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (973) 575-2555, ext. 3284 or dial (800) 451-6027, press 0 and ask for 3-6878.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

LQ/EVP

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**GBMD, Inc.
1520 Mishawaka Street
Elkhart, Indiana 46515**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-6921-00312	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: December 31, 1998
First Administrative Amendment: 039-12793	Pages Affected: 3, 4, 5, 27, 28, 29, 30, 31, 35, 36, 37
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

- C.7 Operation of Equipment [326 IAC 2-7-6(6)]
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

Testing Requirements [326 IAC 2-7-6(1)]

- C.9 Performance Testing [326 IAC 3-6]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
- C.12 Monitoring Methods [326 IAC 3]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
[326 IAC 2-7-6] [326 IAC 1-6]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]
- C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection

- C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - One (1) Paint Booth and Two (2) Assembly Areas 27

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
- D.1.3 Vehicle Limitation [326 IAC 8-2-9]
- D.1.4 Particulate Matter (PM) [326 IAC 6-3-2]
- D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]
- D.1.7 Volatile Organic Compounds (VOC)
- D.1.8 VOC Emissions

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.1.9 Particulate Matter (PM)
- D.1.10 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.11 Record Keeping Requirements
- D.1.12 Reporting Requirements

D.2	FACILITY OPERATION CONDITIONS - Woodworking areas	31
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Semi-Annual Compliance Monitoring Report		35
Two (2) Quarterly Report Forms		36, 37

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary van and truck conversion source.

Responsible Official:	Fred Emmert
Source Address:	1520 Mishawaka Street, Elkhart, Indiana 46515
Mailing Address:	1520 Mishawaka Street, Elkhart, Indiana 46515
SIC Code:	3716
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) surface coating paint booth, ~~known~~ identified as EU2, with a maximum capacity of three (3) vans or trucks per hour, using dry filters as particulate matter (PM) overspray control, and exhausting through stacks E1, E2 and E3;
- (b) Two (2) assembly areas, identified as EU4, with a total maximum capacity of three (3) vans or trucks per hour;

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Two (2) woodworking areas, identified as EU3, each with one (1) baghouse for particulate matter control.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) surface coating paint booth, identified as EU2, with a maximum capacity of three (3) vans or trucks per hour, using dry filters for overspray control and exhausting at three (3) stacks, identified as E1, E2 and E3; and
- (b) Two (2) assembly areas, identified as EU4, with a maximum capacity of three (3) vans or trucks per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (General provisions relating to VOC rules: general reduction requirements for new facilities):

- (a) The total volatile organic compound (VOC) input from the application of paints, sealants, and adhesives, including any cleanup solvents, shall be limited to less than 150 tons per twelve consecutive month period.
- (b) The VOC content of the sealers applied shall not exceed 8.8 pounds per gallon less water, based on 30-day weighted average;
- (c) The VOC content of the paints applied shall not exceed 6.1 pounds per gallon less water, based on 30-day weighted average;
- (d) The VOC content of the solvents applied shall not exceed 6.8 pounds per gallon less water, based on 30-day weighted average;
- (e) The following pollution prevention techniques shall be adhered to:
 - (1) All paints applied in the paint booth (EU2) shall be applied using high volume, low pressure (HVLP) or air assisted airless spray guns, or equivalent spray applicators at least as efficient, with dry filters for overspray control;
 - (2) The spray guns used in the paint booth (EU2) shall be the type that can be cleaned without the need for spraying the solvent into the air;
 - (3) The cleanup solvent containers used to transport solvent from drums to work areas will be closed containers having soft gasketed spring-loaded closures;
 - (4) Clean-up rags saturated with solvent will be stored, transported, and disposed of in containers that are tightly closed;

- (5) All solvent sprayed during cleanup or color changes in EU2 shall be directed into containers. Such containers will be closed as soon as solvent spraying is complete and the waste solvent will be disposed of in such a manner that evaporation is minimized;
- (6) Storage containers used to store VOC and/or HAPs containing materials will be kept covered when not in use;
- (7) The EU2 paint application equipment operators will be instructed and trained on the methods and practices to minimize overspray and maximize transfer efficiency;
- (8) Coatings will be used that contain the lowest levels of VOC possible. The use of exempt solvents such as water, acetone and methyl acetate will be used to the extent possible.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.3 Vehicle Limitation [326 IAC 8-2-9]

The number of vehicles coated shall be limited to thirty-four (34) vehicles per day and any change or modification which increases the number of vehicles coated per day to thirty-five (35) or greater shall require IDEM, OAMs prior approval before any such change may occur. Therefore, 326 IAC 8-2-9 does not apply.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to CP-039-4365-00312, issued on May 31, 1995, and pursuant to 326 IAC 6-3-2, the PM from the one (1) paint booth (EU2), and the two (2) assembly areas (EU4), shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period).

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2, the dry filters for PM control shall be in operation at all times when the one (1) paint booth (EU2) is in operation.

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters when EU2 is in operation. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (E1, E2, and E3) for any week during which EU2 is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed, for any month during which EU2 is in operation, of the coating emissions from the stacks and the general ventilation exhausts, and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1(a) through (d), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The 30-day weighted average VOC content for each type of coating materials;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.9 and D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.1.3, the Permittee shall maintain a record of the number of vehicles coated per day.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1(a) through (d) and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Two (2) woodworking areas, identified as EU3, each with one (1) baghouse for particulate matter control.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 2.11 pounds per hour when operating at a process weight rate of 740 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: GBMD, Inc.
Source Address: 1520 Mishawaka Street, Elkhart, Indiana 46515
Mailing Address: 1520 Mishawaka Street, Elkhart, Indiana 46515
Part 70 Permit No.: T039-6921-00312

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually based on a calendar year. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: GBMD, Inc.
Source Address: 1520 Mishawaka Street, Elkhart, Indiana 46515
Mailing Address: 1520 Mishawaka Street, Elkhart, Indiana 46515
Part 70 Permit No.: T039-6921-00312
Facility: One (1) surface coating paint booth (EU2), and two (2) assembly areas (EU4)
Parameter: Volatile organic compounds (VOC)
Limit: (a) The total volatile organic compound (VOC) input from the application of paints, sealants, and adhesives, including any cleanup solvents, shall be limited to less than 150 tons per twelve (12) consecutive month period.
(b) The VOC content of the sealers applied shall not exceed 8.8 pounds per gallon less water, based on 30-day weighted average;
(c) The VOC content of the paints applied shall not exceed 6.1 pounds per gallon less water, based on 30-day weighted average; and
(d) The VOC content of the solvents applied shall not exceed 6.8 pounds per gallon less water, based on 30-day weighted average.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC This Month (tons)	VOC Previous 11 Months (tons)	12 Month Total VOC (tons)
Month 1			
Month 2			
Month 3			

30-day Weighted Average VOC Content (in pounds per gallon less water):

Sealers: _____ Paints: _____ Solvents: _____

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: GBMD, Inc.
Source Address: 1520 Mishawaka Street, Elkhart, Indiana 46515
Mailing Address: 1520 Mishawaka Street, Elkhart, Indiana 46515
Part 70 Permit No.: T 039-6921-00312
Facilities: One (1) surface coating paint booth (EU2) and two (2) assembly areas (EU4)
Parameter: Number of vehicles coated
Limit: Thirty-four (34) vehicles per day, each, for EU2 and EU4

Month: _____ Year: _____

Day	# of Vehicles Coated		Day	# of Vehicles Coated	
	EU2	EU4		EU2	EU4
1			17		
2			18		
3			19		
4			20		
5			21		
6			22		
7			23		
8			24		
9			25		
10			26		
11			27		
12			28		
13			29		
14			30		
15			31		
16			no. of deviations		

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

A certification is not required for this report.